

AUG 23 2021

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

GEORGIANNA A.M. GIAMPIETRO

NO. 2:19-cr-00013


DEPUTY CLERK

18 U.S.C. § 1512(c)(1)

18 U.S.C. § 1519

18 U.S.C. § 2339B(a)(1)

Chief Judge Crenshaw

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

Between on or about November 24, 2017, and on or about October 23, 2018, in the Middle District of Tennessee and elsewhere, **GEORGIANNA A.M. GIAMPIETRO**, a national of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit: personnel and services, to Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, aliases for Al-Nusrah Front, which at all times relevant to this indictment was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning in or about May 2018, and continuing through in or about June 2018, in the Middle District of Tennessee and elsewhere, **GEORGIANNA A.M. GIAMPIETRO**, a national of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit: currency, to Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, aliases for Al-Nusrah Front, which at all times relevant to this indictment was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT THREE

Beginning in or about March 2018, and continuing until on or about October 23, 2018, in the Middle District of Tennessee, **GEORGIANNA A.M. GIAMPIETRO**, did knowingly alter, destroy, conceal, and cover up a record and document, including, but not limited to, social media accounts, text messages, chat conversations, and other electronic communications, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, that is, a possible violation of Title 18, United States Code, Section 2339B(a)(1), a matter within the jurisdiction of the Federal Bureau of Investigation, and in relation to and in contemplation of such matter.

In violation of Title 18, United States Code, Section 1519.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

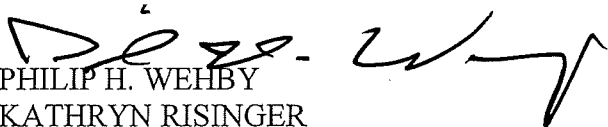
Between on or about September 23, 2018, and on or about October 23, 2018, in the Middle District of Tennessee, **GEORGIANNA A.M. GIAMPIETRO**, knowingly and corruptly did alter, destroy, and conceal a record and document, including, but not limited to, contact information, text messages, electronic communications, and a cell phone, and corruptly did attempt to do so, with the intent to impair the record and document's integrity and availability for use in an official proceeding, namely, a grand jury investigation into a possible violation of Title 18, United States Code, Section 2339B(a)(1).

In violation of Title 18, United States Code, Section 1512(c)(1).

A TRUE BILL


FOREPERSON

MARY JANE STEWART
ACTING UNITED STATES ATTORNEY


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KATHRYN RISINGER
Assistant United States Attorneys
JENNIFER LEVY
Trial Attorney – Department of Justice